

IV. Remarks

Reconsideration of this application in light of the above amendments and the following remarks is requested. Claims 48, 54-55, and 58 are currently canceled. Claim 66 is currently added. Claim 35, 39-47, 49, 51-53, 56-57, and 59-65 are currently amended. Therefore, claims 35-47, 49, 51-53, 56-57, and 59-66 are pending and submitted for consideration herein.

A. Rejections under 35 U.S.C. § 101

The Office Action rejected claims 40-49 and 51-55 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claim 48 and 54-55 are currently canceled, thus rendering this rejection moot as to those claims. Claim 40 is currently amended to claim a “payment processor computer.” Applicants respectfully traverse the rejection of claim 40 under 35 U.S.C. §101. The specification of the present application teaches that a payment processor may be implemented computer as follows: “The heart of the present system is a payment processor 40, which can be conveniently implemented on a suitable general purpose digital computer programmed as explained in greater detail later.” Application, ¶[0021]. In view of the foregoing, claim 40, and all claims that depend therefrom, including claims 41-47, 49, and 51-53, are directed to statutory subject matter. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 40-49 and 51-55 under 35 U.S.C. § 101.

B. Objection to Specification

Pages 4-5 of the Office Action set forth an objection to the specification as failing to provide antecedent basis for the “account identifier” recited in claim 40. Applicants respectfully traverse this objection. Claim 40 is currently amended to address this objection. Accordingly, the Applicants respectfully request that this objection be withdrawn.

C. Rejections under 35 U.S.C. § 112

The current Office Action rejects claims 35-39, 48-49, and 51-58 under 35 U.S.C. § 112 first paragraph. Applicants respectfully traverse this rejection, because the pending claims, as currently amended, no longer recite the claim element of “wherein the intermediary account number is different from the end-user account number.” For this reason, Applicants respectfully request that the Examiner also withdraw the rejection of claims 35-39, 48-49, and 51-58 under 35 U.S.C. § 112. Furthermore,

Applicants respectfully disagree with the Office Action's rejection of claims 35-39, 48-49, and 51-58 under 35 U.S.C. § 112. The specification clearly shows at paragraph [0023] that the intermediary account and the end-user account are different and that each of the intermediary account and the end-user account has its own identifier.

D. Rejections under 35 U.S.C. § 103(a)

1. Claims 40-42, 59-61, and 63-64 under 35 U.S.C. § 103(a) over Dorf

Claims 40-42, 59-61, and 63-64 were rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,000,608 to Dorf (hereinafter referred to as "Dorf"). Applicant traverses this rejection on the grounds that Dorf is defective in establishing a prima facie case of obviousness with respect to claims 40-42, 59-61, and 63-64.

In *KSR Int'l. Co. v. Teleflex Inc.*, 127 S. Ct. 1727, 1739 (2007), the Court stated that "a patent composed of several elements **is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art.** Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a **reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.** This is so because inventions in most, if not all, instances rely upon building blocks long since uncovered, and claimed discoveries almost of necessity will be combinations of what, in some sense, is already known." *Id.* at 1741 (emphasis added).

As the PTO recognizes in MPEP § 2142:

... The examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness. If the examiner does not produce a prima facie case, the applicant is under no obligation to submit evidence of nonobviousness...

In the present application, a prima facie case of obviousness does not exist for the claims as herein amended for the reasons set forth below.

Independent Claim 40

Dorf Does Not Teach the Entire Claimed Subject Matter

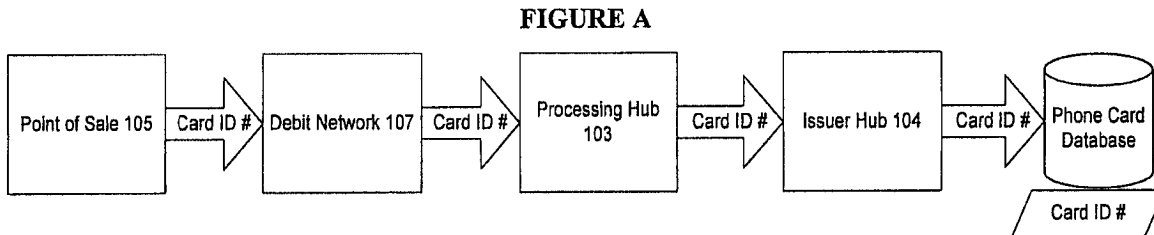
Dorf cannot be applied to reject amended claim 40 under 35 U.S.C. § 103, because it fails to teach the entire claimed subject matter. For example, Dorf fails to teach, show, or even suggest the following, as recited in amended claim 40:

“an end-user interface configured to:
receive, from an end-user, a service account identifier that identifies a service account maintained by a service provider and an intermediary account identifier that identifies a stored value account maintained by a payment processor that is different from the service provider; and
store an association between the service account identifier and the intermediary account identifier in a database that is communicably coupled to the end-user interface upon receiving the service account identifier and the intermediary account identifier from the end-user;”

Thus, for this independent reason alone, the Examiner’s burden of factually supporting a *prima facie* case of obviousness has clearly not been met. Therefore, Applicants traverse the rejection of claim 40 under 35 U.S.C. § 103.

Dorf Teaches:

Applicants submit that Dorf does not teach, show, or even suggest, all of the limitations recited in amended independent claim 40. Please refer to Figure A below for an illustration of the process taught by Dorf.



Dorf teaches, at columns 7 and 8, a card system where a user presents a card 101 at a retailer and indicates the desired purchase amount. The retailer swipes the card 101 through a POS device 105, which communicates the card data, *i.e.*, the card identification number read from the card’s magnetic strip 106, to a bank processor 208. The bank processor 208 communicates the card identification number over the debit network 107 to the sponsoring bank processor 102, which acts as a link between the debit network 107 and the processing hub 103.

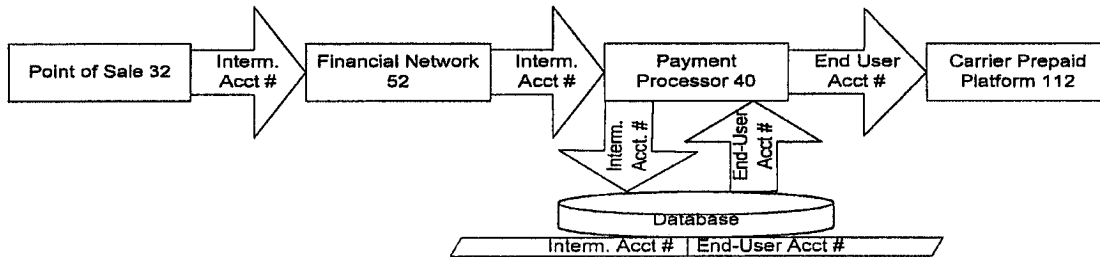
Once the card identification number is received at the processing hub 103, the processing hub 103 recognizes the card identification number as representing a particular prepaid phone card issuer, and forwards the card identification number to a specific issuer hub 104 that is maintained by the corresponding prepaid phone card issuer. The issuer hub 104 activates a record in a phone card database having the same identification number as the card 101, and a value field in this record is updated to reflect the purchase amount. The issuer hub 104 then returns an authorization number back along the same path to the POS device 105, and the user may then use the authorization number to activate the purchased amount of time.

Distinctions:

At a minimum, Dorf fails to teach, show, or even suggest “an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” as recited in amended claim 40. The card identification number taught by Dorf is the same number that is sent from the POS device 105 to the bank processor 208 and the processing hub 103 (Dorf, col. 7, ll. 3-5). Furthermore, the card identification number taught by Dorf is the same number that is sent from the processing hub 103 to the issuer hub 104 (Dorf, col. 7, ll. 9-13, 15-18). Thus, the card identification number taught by Dorf is the only number used throughout the entire process taught by Dorf, as shown above in Figure A. This is clearly taught by Dorf as follows: “When the issuer hub 104 receives the data from the processing hub 103, it activates the record in the phone card database 204 having the same identification number as the card 101” (Dorf, col. 7, ll. 15-18, **emphasis added**).

Please refer to Figure B below for an illustration of an exemplary embodiment of a process taught by the present application, which requires an association between the intermediary account number and the service account number:

FIGURE B



As shown in Figure B above, an exemplary embodiment of the payment processor taught in the present application sends the intermediary account number to the database, and retrieves the service account number (end user account #) that is associated with the intermediary account number. However, in the system taught by Dorf, there is no need to “store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” and “use the association between the service account identifier and the intermediary account identifier . . . to determine the service account identifier that is associated with the intermediary account identifier,” as

explicitly recited in amended claim 40, because the system of Dorf uses a single card identification number throughout the entire process.

Thus, Dorf fails to teach, show, or even suggest an “an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” as recited in claim 40. Therefore, Applicants respectfully submit that Dorf clearly fails to teach, show, or even suggest the entire claimed subject matter of independent claim 40 as amended, and as such, the rejection of claim 40 under 35 U.S.C. § 103(a) over Dorf , and all claims depending therefrom, is respectfully requested.

Prior art that teaches away from the claimed invention cannot be used to establish obviousness

KSR maintained the long-standing principal that “when the prior art teaches away from combining certain known elements, discovery of a successful means of combining them is more likely to be non-obvious.” *KSR* at 1740. In the present case the Dorf reference, by teaching a single account/identification number throughout the entire processing sequence, clearly teaches away from “associating an end-user account identifier that represents an end-user’s prepaid account maintained by a telecommunications provider with an intermediary account number,” as recited in claim 40. There is no broader disclosure or non-preferred embodiment taught by Dorf that includes “an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” as recited in claim 40.

Thus, for this reason alone, the Examiner’s burden of factually supporting a *prima facie* case of obviousness has clearly not been met, and the rejection of independent claim 40 under 35 U.S.C. § 103 should be withdrawn.

Dependent Claims 41-42, 59-61, and 63-64

Claims 41-42, 59-61, 63, and 64 were also rejected under 35 U.S.C. § 103(a) over Dorf. Claims 41-42, 59-61, 63, and 64 depend from claim 40, and therefore include at least the elements of claim 40 that have been presented above. Thus, Applicants submit that claims 41-42, 59-61, 63, and 64 are also allowable over Dorf for the same reasons as noted above with respect to claim 40. Therefore, at least for

this reason, it is respectfully submitted that the rejection of claims 41-42, 59-61, 63, and 64 under 35 U.S.C. § 103(a) over Dorf should also be withdrawn.

2. **Rejection of Claims 35-36, 38-39, 48-49, 52-53, and 57-58 under 35 U.S.C. § 103(a) over Dorf in view of Hogan**

Claims 35-36, 38-39, 48-49, 52-53, and 57-58 were rejected under 35 U.S.C. § 103(a) over Dorf in view of U.S. Patent No. 5,704,046 to Hogan (hereinafter referred to as "Hogan"). The Office Action took the position that Dorf teaches each and every limitation recited in rejected claims 35-36, 38-39, 48-49, 52-53, and 57-58, except for the limitation of "wherein the intermediary account number is different from the end-user account identifier." However, the Office Action cited to Hogan as teaching this limitation and concluded that it would have been obvious for one of ordinary skill in the art to have combined the teaching of the cited references to create the invention recited in the rejected claims. Applicants respectfully traverse the rejection and submit that each of the rejected claims recites limitations that are not taught, shown, or even suggested by the cited prior art, when taken alone or in combination.

Independent Claim 35

As mentioned above in section C, the pending claims are currently amended, such that the limitation of "wherein the intermediary account number is different from the end-user account identifier" is no longer recited in any of the pending claims.

Claim 35, as amended, recites:

"an end-user interface communicably coupled to the payment processor system, wherein the end-user interface is configured to:
receive, from an end-user accessing the end-user interface, an intermediary account identifier that identifies a stored value account maintained by the payment processor system and a service account identifier that identifies a service account maintained by a service provider system that is separate from the payment processor system, and
store an association between the intermediary account identifier and the service account identifier in the database maintained by the payment processor system;"

As discussed above, at a minimum, Dorf fails to teach, show, or even suggest receiving an intermediary account identifier and a service account identifier from an end-user, and storing an association between the intermediary account identifier and a service account identifier. Hogan fails to cure the shortcomings of Dorf.

Hogan teaches a sub-account number at the following cited portions: “the account number identifies the account associated with card 100 for billing purposes. The card number acts as a sub-account number identifying additional cards issued under the same account number. Thus, for example a spouse may possess an associated financial card having the same account number but a different card number” (Hogan, col. 5, line 66 to col. 6, line 5).

However, nowhere in Hogan is there any teaching, showing, or suggestion of receiving an intermediary account identifier and a service account identifier from an end-user, and storing an association between the intermediary account identifier and the service account identifier, as expressly recited in Applicant’s claim 35. As such, Applicants submit that Hogan fails to further the teaching of Dorf to the level necessary to properly support an obviousness rejection of Applicants’ claims. Therefore, reconsideration and withdrawal of the rejection of independent claim 35 under 35 U.S.C. § 103 over Dorf in view of Hogan is respectfully requested.

Dependent Claims 36, 38-39, and 57-58

Claims 36 and 38-39, and 57-58 were also rejected under 35 U.S.C. § 103(a) over Dorf in view of Hogan. Claim 58 is currently canceled, thereby rendering the rejection of claim 58 under 35 U.S.C. § 103(a) over Dorf in view of Hogan moot. Claims 36, 38-39, and 57 depend from claim 35, and therefore include at least the elements of claim 35. Thus, claims 36, 38-39, and 57 are also allowable over Dorf in view of Hogan for the same reasons as noted above with respect to claim 35. Therefore, at least for the reasons set forth above with respect to claim 35, it is respectfully submitted that the rejection of claims 36, 38-39, and 57-58 under 35 U.S.C. § 103(a) over Dorf in view of Hogan should also be withdrawn.

Independent Claim 48

As mentioned above, independent claim 48 is currently canceled, thereby rendering the rejection of claim 48 under 35 U.S.C. § 103(a) over Dorf in view of Hogan moot. Applicants respectfully request withdrawal of rejection of claim 48 under 35 U.S.C. § 103(a) over Dorf in view of Hogan for this reason.

Dependent Claims 49 and 52-53

Claims 49 and 52-53 were also rejected under 35 U.S.C. § 103(a) over Dorf in view of Hogan. However, claims 49 and 52-53 are currently amended to depend from independent claim 40, which has been shown above to be allowable. Thus, claims 49 and 52-53 are also allowable over Dorf in view of Hogan for the same reasons as noted above with respect to claim 40. Therefore, at least for the reasons

set forth above with respect to claim 40, it is respectfully submitted that the rejection of claims 49 and 52-53 under 35 U.S.C. § 103(a) over Dorf in view of Hogan should also be withdrawn.

3. **Rejection of Claims 43, 45-47, and 62 under 35 U.S.C. § 103(a) over Dorf in view of Muehlberger**

Claims 43, 45-47, and 62 were rejected under 35 U.S.C. 103(a) over Dorf in view of U.S. Patent No. 5,696,908 to Muehlberger (hereinafter referred to as "Muehlberger"). The Office Action took the position that Dorf teaches each and every limitation recited in the rejected claims, except for electronic funds transfer (claim 43), the collecting step is effecting via the ACH (claim 45), and the point-of-sale terminal comprises a vending machine (claim 62). However, the Office Action cited to Muehlberger as teaching the foregoing elements, and concluded that it would have been obvious for one of ordinary skill in the art to have combined the teaching of the cited references to create the invention recited in the rejected claims. Applicants respectfully traverse the rejection and submit that the rejected claims recite limitations that are not taught, shown, or even suggested by the cited prior art, when taken alone or in combination.

Claims 43, 45-47, and 62 depend from independent claim 40, and therefore include at least the elements of independent claim 40, which has been shown above to be allowable. Thus, claims 43, 45-47, and 62 include at least the element of "an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user," as recited in amended independent claim 40. As set forth above with respect to claim independent 40, Dorf fails to teach this claim element. Muehlberger fails to cure this shortcoming of Dorf. As such, reconsideration and withdrawal of the rejection of claims 43, 45-47, and 62 under 35 U.S.C. § 103(a) over Dorf in view of Muehlberger is respectfully requested.

4. **Rejection of Claims 37, 54, and 55 under 35 U.S.C. § 103(a) over Dorf in view of Hogan, and further in view of Muehlberger**

Claims 37, 54, and 55 were rejected under 35 U.S.C. § 103(a) over Dorf in view of Hogan, and further in view of Muehlberger. The Office Action took the position that Dorf, Hogan, and Muehlberger

teach the elements of claims 37, 54, and 55, and concluded that it would have been obvious for one of ordinary skill in the art to have combined the teaching of the cited references to create the invention recited in the rejected claims. Applicants respectfully traverse the rejection and submit that the rejected claims recite limitations that are not taught, shown, or even suggested by the cited prior art, when taken alone or in combination.

Claim 37 depends from independent claim 35, and therefore includes at least the elements of claim 35, which has been shown above to be allowable. Thus, claim 37 includes at least the elements of receiving an intermediary account identifier and a service account identifier from an end-user, and storing an association between the intermediary account identifier and a service account identifier. As set forth above with respect to claim 35, Dorf and Hogan, whether taken alone or in combination, fail to teach receiving an intermediary account identifier and a service account identifier from an end-user, and storing an association between the intermediary account identifier and a service account identifier. Further, as set forth above with respect to the rejection of claims 43, 45-47, and 62, Muehlberger also fails to teach, show or suggest receiving an intermediary account identifier and a service account identifier from an end-user, and storing an association between the intermediary account identifier and a service account identifier. Therefore, reconsideration and withdrawal of the rejection of claim 37 under 35 U.S.C. § 103(a) over Dorf in view of Hogan, and further in view of Muehlberger is respectfully requested.

Claims 54 and 55 are currently are currently canceled without disclaimer or prejudice, thereby rendering the rejection of claims 54 and 55 under 35 U.S.C. § 103(a) over Dorf in view of Hogan, and further in view of Muehlberger moot.

5. **Rejection of Claim 44 under 35 U.S.C. § 103(a) over Dorf in view of Muehlberger and further in view of Risafi**

Claim 44 was rejected under 35 U.S.C. § 103(a) over Dorf in view of Muehlberger and further in view of U.S. Patent No. 6,473,500 to Risafi (hereinafter referred to as "Risafi"). The Office Action took the position that Dorf in view of Muehlberger teaches each and every limitation recited in the rejected claim 44, except for the collecting step is carried out in a batch mode on a daily basis. However, the Office Action cited to Risafi as teaching this limitation recited in the rejected claim, and concluded that it would have been obvious for one of ordinary skill in the art to have combined the teaching of the cited references to create the invention recited in the rejected claim. Applicants respectfully traverse the rejection and submit that the rejected claims recite limitations that are not taught, shown, or even suggested by the cited prior art, when taken alone or in combination.

Claim 44 depends from independent claim 40, and therefore includes at least the elements of claim 40, which has been shown above to be allowable. As set forth above with respect to claims 43, 45-47, and 62, neither Dorf nor Muehlberger, whether taken alone or in combination, teaches, shows or even suggests "an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user," as recited in claim 40. Risafi fails to cure this shortcoming of Dorf and Muehlberger.

Therefore, Applicants submit that the cited combination of Dorf, Muehlberger, and Risafi fails to render claim 44 obvious, as none of the cited references, when taken alone or in combination, teaches, shows, or even suggests "an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user," as recited in claim 40. Thus, reconsideration and withdrawal of the rejection of claim 44 under 35 U.S.C. § 103(a) over Dorf in view of Muehlberger and further in view of Risafi is respectfully requested.

6. **Rejection of Claim 51 under 35 U.S.C. § 103(a) over Dorf in view of Hogan and in further view of Carson**

Claim 51 was rejected under 35 U.S.C. § 103(a) over Dorf in view of Hogan and in further view of Carson. The Office Action took the position that Dorf in view of Hogan teaches each and every limitation recited in the rejected claim 51, except for the account being a cellular phone account. However, the Office Action cited to Carson as teaching this limitation recited in the rejected claim, and concluded that it would have been obvious for one of ordinary skill in the art to have combined the teaching of the cited references to create the invention recited in the rejected claim. Applicants respectfully traverse the rejection and submit that the rejected claims recite limitations that are not taught, shown, or even suggested by the cited prior art, when taken alone or in combination.

Claim 51 is currently amended to depend from independent claim 40, and therefore includes at least the elements of claim 40, which has been shown above to be allowable. Thus, claim 51 includes at least the element of “an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” as recited in claim 40. As set forth above with respect to claims 35-36, 38-39, 48-49, 52-53, and 57-58, Dorf and Hogan fail to teach, show or suggest this claim element. Applicants submit that Carson fails to further the teaching of Dorf in view of Hogan to the level necessary to properly support an obviousness rejection of Applicants’ claim 51 under § 103 of the Patent Laws.

Therefore, Applicants submit that the cited combination of Dorf, Hogan and Carson fails to render claim 51 obvious, as none of the cited references, when taken alone or in combination, teaches, shows, or even suggests “an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” Thus, reconsideration and withdrawal of the rejection of claim 51 under 35 U.S.C. § 103(a) over Dorf in view of Hogan and in further view of Carson is respectfully requested.

7. Rejection of Claim 65 under 35 U.S.C. § 103(a) over Dorf in view of Risafi

Claim 65 was rejected under 35 U.S.C. § 103(a) over Dorf in view of Risafi. The Office Action took the position that Dorf teaches each and every limitation recited in the rejected claim 65, except for electronically communicating data include interaction with an IVR system via telecommunications. However, the Office Action cited to Risafi as teaching this limitation recited in the rejected claim 65 and concluded that it would have been obvious for one of ordinary skill in the art to have combined the teaching of the cited references to create the invention recited in the rejected claim. Applicants respectfully traverse the rejection and submit that the rejected claims recite limitations that are not taught, shown, or even suggested by the cited prior art, when taken alone or in combination.

Claim 65 depends from independent claim 40, and therefore includes at least the elements of claim 40, which has been shown above to be allowable. Thus, claim 65 includes at least the element of “an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” as recited in claim 40. As set forth above with respect to claims 40-42, 59-61, and 63-64, Dorf fails to teach, show or suggest this element. Further, as set forth above with respect to claim 44, Risafi fails to cure the shortcomings of Dorf.

Therefore, Applicants submit that the cited combination of Dorf and Risafi fails to render claim 65 obvious, as none of the cited references, when taken alone or in combination, teaches, shows, or even suggests the “an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user.” Therefore, reconsideration and withdrawal of the rejection of claim 65 under 35 U.S.C. § 103(a) over Dorf in view of Risafi is respectfully requested.

8. Rejection of Claim 56 under 35 U.S.C. § 103(a) over Dorf in view of Hogan and further in view of Risafi

Claim 56 was rejected under 35 U.S.C. § 103(a) over Dorf in view of Hogan and further in view of Risafi. The Office Action took the position that Dorf in view of Hogan teaches each and every

limitation recited in the rejected claim 56, except for purchasing via the Internet. However, the Office Action cited to Risafi as teaching this limitation recited in the rejected claim and concluded that it would have been obvious for one of ordinary skill in the art to have combined the teaching of the cited references to create the invention recited in the rejected claim. Applicants respectfully traverse the rejection and submit that the rejected claims recite limitations that are not taught, shown, or even suggested by the cited prior art, when taken alone or in combination.

Claim 56 is currently amended to depend from independent claim 40, and therefore includes at least the elements of claim 40, which has been shown above to be allowable. Thus, claim 56 includes at least the element of “an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” as recited in amended independent claim 40. As set forth above with respect to claims 35-36, 38-39, 48-49, 52-53, and 57-58, both Dorf and Hogan fail to teach, show or suggest this element. Further, as set forth above with respect to claim 44, Risafi also fails to teach, show or suggest this element.

Therefore, Applicants submit that the cited combination of Dorf, Hogan and Risafi fails to render claim 56 obvious, as none of the cited references, when taken alone or in combination, teaches, shows, or even suggests “an end-user interface configured to: receive, from an end-user, a service account identifier . . . and an intermediary account identifier . . . ; and store an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user,” as recited in claim 40. Thus, reconsideration and withdrawal of the rejection of claim 56 under 35 U.S.C. § 103(a) over Dorf in view of Hogan and further in view of Risafi is respectfully requested.

E. New claims

New claim 66 recites the following:

An apparatus comprising:
a computer program embodied on a computer readable medium; and
a plurality of instructions stored in the computer readable medium, the plurality of instructions comprising:
instructions for receiving, from an end-user, a service account identifier that identifies a service account maintained by a service provider and an intermediary account

identifier that identifies a stored value account maintained by a payment processor that is different from the service provider;

instructions for storing an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user;

instructions for receiving a payment from the end-user at a point-of-sale together with the intermediary account identifier;

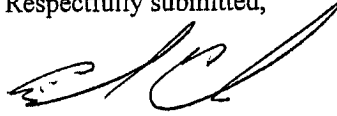
instructions for electronically communicating the intermediary account identifier, from the point-of-sale to the payment processor; and
instructions for sending a message from the payment processor to the service provider, wherein the message indicates a credit to a service account identified by the service account identifier associated with the intermediary account identifier.

Applicants submit that claim 66 is allowable at least because new claim 66 recites “instructions for receiving, from an end-user, a service account identifier that identifies a service account maintained by a service provider and an intermediary account identifier that identifies a stored value account maintained by a payment processor; instructions for storing an association between the service account identifier and the intermediary account identifier in a database maintained by the payment processor upon receiving the service account identifier and the intermediary account identifier from the end-user.” As discussed above, none of the prior art cited in the Office Action, whether taken separately or in combination, teaches, shows, or even suggests this recited element.

IV. Conclusion

It is believed that all matters set forth in the Office Action have been addressed. Favorable consideration and an early indication of the allowability of the claims are respectfully requested. Should the Examiner deem that an interview with Applicants' undersigned attorney would expedite consideration, the Examiner is invited to call the undersigned attorney at the telephone number indicated below.

Respectfully submitted,



Andrew S. Ehmke
Registration No. 50,271

Dated: July 27, 2009

HAYNES AND BOONE, LLP
2323 Victory Avenue, Suite 700
Dallas, Texas 75219
Telephone: 214/651-5116
IP Facsimile No. 214/200-0853
File: 39048.21

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Date: July 27, 2009

Kirsta Myrick